

1 Brian D. Huben (SBN 134354)
2 Ballard Spahr LLP
3 2029 Century Park East, Suite 800
4 Los Angeles, California 90067-2909
5 Telephone: 424-204-4353
6 Facsimile: 424-204-4350
7 Email: hubenb@ballardspahr.com

8 -and-

9 Matthew G. Summers, Esquire*
10 Ballard Spahr LLP
11 919 North Market Street, 11th Floor
12 Wilmington, Delaware 19801
13 Telephone: 302-252-4428
14 Facsimile: 410-361-8930
15 Email: summersm@ballardspahr.com
16 (*Motion for *pro hac vice* admission to be filed)

17 *Attorneys for URENCO Limited and Louisiana Energy Services, LLC*

18 **UNITED STATES BANKRUPTCY COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**
20 **SAN FRANCISCO DIVISION**

21 **In re:**

22 **PG&E CORPORATION,**

23 **-and-**

24 **PACIFIC GAS AND ELECTRIC**
25 **COMPANY,**

26 **Debtors.**

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR NOTICES**

27 PLEASE TAKE NOTICE, that the undersigned counsel hereby enter their
28 appearance for are URENCO Limited and Louisiana Energy Services, LLC (together,
“URENCO”) pursuant to section 1109(b) of title 11 of the United States Code, 11 U.S.C. §§ 101
et seq., (the “Bankruptcy Code”) and Rules 2002, 3017, 9007 and 9010(b) of the Federal Rules of

1 Bankruptcy Procedure and hereby request that copies of all pleadings, motions, notices and other
2 papers filed or served in this bankruptcy case, be served upon URENCO through its undersigned
3 counsel, as follows:

4 Brian D. Huben (SBN 134354)
5 Ballard Spahr LLP
6 2029 Century Park East, Suite 800
7 Los Angeles, California 90067-2909
8 Telephone: 424-204-4353
Facsimile: 424-204-4350
Email: hubenb@ballardspahr.com

Matthew G. Summers, Esquire
Ballard Spahr LLP
919 North Market Street, 11th Floor
Wilmington, Delaware 19801
Telephone: 302-252-4428
Facsimile: 410-361-8930
Email: summersm@ballardspahr.com

9 PLEASE TAKE FURTHER NOTICE that pursuant to section 1109(b) of the
10 Bankruptcy Code, the foregoing request includes, without limitation, all orders, notices,
11 applications, motions, petitions, pleadings, requests, complaints, demands, replies, answers,
12 schedules of assets and liabilities, statements of financial affairs, operating reports, plans of
13 reorganization, and disclosure statements, whether formal or informal, and whether transmitted or
14 conveyed by mail, hand delivery, telephone, telegraph, telex, facsimile, or otherwise.

15 PLEASE TAKE FURTHER NOTICE that neither this *Notice of Appearance and*
16 *Request for Notices* nor any subsequent appearance, pleading, claim, or suit is intended or shall be
17 deemed or construed to constitute a waiver of any substantive or procedural right of URENCO
18 including, without limitation, (i) the right to have final orders in non-core matters entered only
19 after *de novo* review by a United States District Court (the "District Court"), (ii) the right to trial
20 by jury in any proceeding related to these cases or any case, controversy, or proceeding related to
21 these cases, (iii) the right to have the District Court withdraw the reference in any matter subject to
22 mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court,
23 absent consent of the parties, cannot enter final orders or judgments consistent with Article III of
24 the United States Constitution heard by the District Court, or (v) any other rights, claims, actions,
25 defenses, setoffs, or recoupments to which the Creditors are or may be entitled, in law or in equity,
26 all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.
27 Unless and until URENCO expressly states otherwise, URENCO does not consent to the entry of
28

1 final orders or judgments by this Court if it is determined that this Court, absent consent of the
2 parties, cannot enter final orders or judgments consistent with Article III of the United States
3 Constitution.

4 Dated: February 13, 2019

/s/ Briand D. Huben

Brian D. Huben (SBN 134354)
Ballard Spahr LLP
2029 Century Park East, Suite 800
Los Angeles, California 90067-2909
Telephone: 424-204-4353
Facsimile: 424-204-4350
Email: hubenb@ballardspahr.com

-and-

Matthew G. Summers, Esquire*
Ballard Spahr LLP
919 North Market Street, 11th Floor
Wilmington, Delaware 19801
Telephone: 302-252-4428
Facsimile: 410-361-8930
Email: summersm@ballardspahr.com
(*Motion for *pro hac vice* admission to be filed)

*Attorneys for URENCO Limited and Louisiana
Energy Services, LLC*